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*Attorneys for Plaintiff Securities and Exchange Commission*

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL

**NOTICE OF WITHDRAWAL OF  
COUNSEL**

Case No.: 2:23-cv-00482-RJS-DBP

Chief Judge Robert J. Shelby

Chief Magistrate Judge Dustin B. Pead

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EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

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Pursuant to DUCivR 83-1.4(b), notice is hereby given that Troy Flake (California Bar No. 267523) withdraws as counsel for Plaintiff, Securities and Exchange Commission. Plaintiff continues to be represented by attorneys who have appeared under DUCivR 83-1.3; and the continuing attorneys are aware of and will comply with all pending deadlines, hearings, and trial dates.

Dated: April 15, 2024.

/s/ Troy Flake

*(Signed by Nicholas P. Heinke with permission of  
Troy Flake)*

/s/ Nicholas P. Heinke

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*Attorney for Plaintiff  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of April, 2024, I filed the foregoing **NOTICE OF WITHDRAWAL OF COUNSEL** via the Court's CM/ECF System, which sent notification and service to all counsel of record.

*/s/ Nicholas P. Heinke*

Nicholas P. Heinke